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*\*Pro hac vice applications forthcoming*

*Additional counsel for Petitioners Oasis Focus  
Fund LP and Quadre Investments, L.P.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

In re Application of

507 Summit LLC, Oasis Focus Fund LP, and  
Quadre Investments, L.P.,

Petitioners, for an Order Pursuant to 28 U.S.C. §  
1782 to Conduct Discovery for Use in a Foreign  
Proceeding.

**CASE NO. 4:23-mc-80243-DMR**

**JOINT STATUS REPORT AND  
~~PROPOSED~~ ORDER**

**JOINT STATUS REPORT**

Petitioners 507 Summit LLC, Oasis Focus Fund LP, and Quadre Investments, L.P.  
("Petitioners") and Respondent James Liang ("Respondent," and together with Petitioners, "the  
Parties") respectfully submit this Joint Status Report pursuant to the Court's January 18, 2024 Order,  
ECF No. 22.

1 On September 21, 2023, Petitioners filed an Application pursuant to 28 U.S.C. § 1782 seeking  
2 leave to serve a subpoena on Respondent, ECF No. 1.

3 On January 18, 2024, the Court entered a joint stipulation between the Parties under which,  
4 among other things, Respondent agreed to make Mr. Tony Jiang, a knowledgeable witness, available  
5 for a deposition (the “Ocean Link Deposition”) on or before February 16, 2024, ECF No. 22.

6 The Ocean Link Deposition occurred on January 22, 2024. The Parties are conferring as to  
7 the status of Petitioners’ Application and a related application against another individual associated  
8 with Ocean Link Partners II GP Limited in the United States District Court for the District of Arizona  
9 captioned *In re Application of 507 Summit LLC, et al.*, Case No. 2:23-mc-00040-MTL (D. Ariz.).

10 The Parties agree that the proceedings shall be stayed until March 18, 2024. By the same date,  
11 the Parties shall file either a dismissal or a status report.

12  
13 Dated: February 16, 2024

By: /s/ Marc S T Dworsky

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By: /s/ Evert J. Christensen, Jr.

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**FILER'S ATTESTATION**

Pursuant to L.R. 5-1(h)(3), I, Marc S. T. Dworsky, attest that all other signatories listed and on whose behalf this filing is submitted have authorized this filing and concur in its content.

By: /s/ Marc S. T. Dworsky

**~~PROPOSED~~ ORDER**

**PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO ORDERED.**

SO ORDERED this 22nd Day of February, 2024

  
The Honorable Donna M. Ryu Chief  
Magistrate Judge